

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

RED BARN MOTORS, INC., PLATINUM )  
MOTORS, INC., and MATTINGLY AUTO )  
SALES, INC., individually and on behalf of )  
other members of the general public similarly )  
situated, )  
Plaintiffs, )  
v. )  
NEXTGEAR CAPITAL, INC. f/k/a DEALER )  
SERVICES CORPORATION, )  
Defendant. )

**JOINT MOTION FOR STAY OF CASE PENDING SETTLEMENT**

The parties jointly notify the Court that they have reached a settlement in principle of Plaintiffs' individual and class claims and that class counsel intend to move the Court for preliminary approval of the settlement upon the finalization of a written settlement agreement. The parties estimate they can complete that process and an unopposed motion for preliminary approval can be filed by January 25, 2021. To minimize the expenditure of the Court's resources, and to allow the parties to focus their efforts on finalizing the settlement agreement without the additional burdens associated with trial preparation, the parties respectfully move to stay all proceedings; to cancel the December 22, 2020 pretrial conference; and to continue the trial currently scheduled to begin on January 25, 2021.

WHEREFORE, the parties respectfully request that the Court enter the attached Proposed Order staying the case.

Respectfully submitted, this 23rd day of November, 2020.

s/ Tracey K. Ledbetter

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served upon the following counsel of record via the Court's electronic service notification system, this 23rd day of November, 2020:

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